



United States Department of the Interior

BUREAU OF LAND MANAGEMENT

Upper Snake River District
Pocatello Field Office
1111 North 8th Avenue
Pocatello, Idaho 83201-5789

In Reply Refer To:
(I-27512, I-01441)

September 15, 2003

Dear Interested Party:

The Pocatello Field Office of the Bureau of Land Management and the Caribou-Targhee National Forest are preparing an Environmental Impact Statement (EIS) for a mine plan proposed by J. R. Simplot Company (Simplot) for additional development of the existing Smoky Canyon Phosphate Mine (Panels F and G and associated facilities). The proposed mining activities would occur on lands administered by the U.S. Forest Service (FS) and mineral estate administered by the U.S. Bureau of Land Management (BLM). The agencies will evaluate the environmental effects of the proposed action and alternatives, mitigation of site-specific environmental consequences related to the proposed mining activities, and determine appropriate conditions for approval.

The Smoky Canyon Mine is located approximately 20 miles west of Afton, Wyoming in Eastern Caribou County, Idaho ([see attached map](#)). The operations would occur on Federal Phosphate Leases No. I-27512 (F Panel) and I-01441 (G Panel).

The proposed mining activities consist of two open pits, Panels F and G (sometimes referred to as Manning Creek and Deer Creek tracts, respectively), topsoil stockpiles, mine equipment parking and service areas, access and haul roads, a power line extension from the existing Smoky Canyon loop, permanent external overburden storage areas, and runoff/sediment control facilities. A new haul/access road would be constructed from the south end of the existing Panel E approximately 0.7 miles to the proposed Panel F. As operations move south to Panel G, another haul road is proposed to transport ore from the southern end of Panel G to the north end of Panel F, 7.7 miles north. Some of these activities are proposed to occur within portions of the Forest Service's Sage Creek and Meade Peak Inventoried Roadless Areas (IRAs).

At the present time, the management prescription directions for IRAs in the Caribou National Forest Final Revised Forest Plan will be followed by the FS when making management decisions related to IRAs. The management prescription directions in the Final Revised Forest Plan that were selected for the Sage Creek and Meade Peak IRAs include: Prescription 8.2.1 on inactive leases, Known Phosphate Leasing Areas (KPLAs) and prospecting and exploration areas, and 8.2.2 on active leases and Special Use Permit areas (Revised Forest Plan pg. 4-80). Prescription

8.2.2 applies to federal phosphate leases where mining, reclamation, or exploration is taking place. Exploration and development of existing leases, such as on the Simplot Manning Creek and Deer Creek leases, are allowable within an IRA under this prescription, with multi-agency, site-specific NEPA analysis of proposed mining and reclamation plans consideration of the Forest Plan Standards. Conditions of any plan approval would follow Forest-wide direction for Minerals and Geology, management prescription direction, and current Best Management Practices, which can change over time as monitoring and research dictate.

As proposed, the existing Smoky Canyon Mine maintenance, administrative, and milling facilities would continue to be used. However, because Panels F & G lie several miles south of the currently existing maintenance and fuel facilities, proposed new mine support facilities at the new panels would include: equipment ready lines, electrical substations, warehouse and storage areas, lunch rooms, repair shops, restrooms, fuel and lubricant storage and dispensing facilities, and blasting supplies storage.

Ore from the new panels would be hauled in trucks over new and existing haul/access roads to the existing Smoky Canyon mill facilities to be concentrated. Ore concentrate from the mill would be transported to the Simplot fertilizer plant in Pocatello, Idaho via the existing slurry pipeline system. Mill tailings would continue to be deposited in the currently approved and permitted tailings disposal facilities located on Simplot property east of the mill.

Initially, overburden generated from Panel F would be trucked to the existing Panel E open pit and used as backfill. Excess waste rock is proposed to be permanently placed in a 35-acre pit overfill area on lease. Remaining overburden from Panel F would be placed as backfill in mined-out portions of Panel F. Overburden generated from mining Panel G would be used as backfill in the Panel G open pit. Excess overburden would be permanently placed in 132 acres of external dumps on lease.

Disturbed lands directly resulting from the proposed activities would total about 1,325 acres. New pits would disturb approximately 842 acres of which approximately 796 acres would be backfilled and reclaimed. Forty-six acres of highwall and pit bottoms would remain after reclamation is complete. Approximately 23 acres of the Panel E open pit (currently approved and active) would be backfilled with overburden from Panel F. This pit is currently permitted to be left open. The rest of the disturbed acreage would consist of approximately 307 acres of roads, 167 acres of overburden disposal areas, and 9 acres of runoff management facilities, water monitoring facilities, and topsoil piles, all of which would be reclaimed. Portions of the proposed mine and haul-road disturbance would be located in the FS Sage Creek and Meade Peak IRAs.

Potential impacts to surface resources and water quality include erosion, sediment, and dissolved contaminants such as selenium. Simplot has proposed to implement practices designed to reduce, eliminate, or mitigate these impacts. Suitable topsoil would be salvaged from disturbed areas for use in reclamation. Reclamation of mining disturbances would include: removal of facilities and equipment, backfilling pits, regrading slopes, restoring drainages, spreading topsoil, stabilizing surfaces, revegetation, testing and treatment for remaining hydrocarbon contaminants, and environmental monitoring.

Simplot has applied for a two-part lease modification to expand Federal Phosphate Lease I-27512 for the Panel F operations - a smaller 120-acre lease modification on the northern edge of the lease, and a larger 400-acre modification on the southern edge of the lease. The proposed northern lease modifications would be included in all action alternatives. The issuance and mining of a southern lease modification would be evaluated as a separate alternative. Environmental impacts of mining operations within the lease modification will be analyzed in this EIS.

Issues initially identified for the proposed mining of F and G panels include potential effects on: ground water and surface water quantity and quality, wetlands, fisheries, wildlife and their habitats, livestock grazing, wetlands and riparian habitat, socio-economics, IRAs, visual resources, and cumulative effects.

The BLM and FS believe, at this early stage, that it is important to give reviewers notice of several court rulings related to public participation in the environmental review process. First, reviewers of draft EISs must structure their participation in the environmental review of the proposal so that it is meaningful and alerts an agency to reviewer's position and contentions; **Vermont Yankee Nuclear Power Corp. v. NRDC, 435 U.S. 519,553 (1978)**. Also, environmental objections that could be raised at the draft EIS stage but that are not raised until after completion of the final EIS may be waived or dismissed by the courts; **City of Angoon v. Hodel, 803 F. 2d 1016, 1022 (9th Cir.1986)** and **Wisconsin Heritages, Inc.v. Harris, 490 F. Supp.1334, 1338 (E.D. Wis. 1980)**. Because of these court rulings, it is very important that those interested in this Proposed Action participate by the close of the 60-day comment period for the draft EIS so that substantive comments and objections are made available to the BLM and FS at a time when they can meaningfully consider them and respond to them in the final EIS.

The EIS will analyze the proposed action, with and without issuing a southern lease modification for the Panel F operations, alternative access/haul road alignments for the Panel G operations, and the no action alternative. Other alternatives that may be considered include additional access and haul road designs, use of conveyors to transport ore to the existing mill, revising the layout or sequencing of the proposed mining facilities, different methods for reducing impacts from overburden handling, and other alternatives developed from public scoping issues which could provide mitigation for impacts.

Simplot must obtain federal permits prior to mining under the proposed mine plan. The existing mining and milling operations have been authorized by two Records of Decision that were issued in 1982, upon completion of the original Smoky Canyon Phosphate Mine EIS, and in 2002, upon completion of the Smoky Canyon Phosphate Mine Supplemental EIS. A new EIS is required for the BLM Idaho State Director to make decisions related to mine plan approval and mineral lease decisions after considering recommendations by the Caribou-Targhee National Forest Supervisor. The FS would make decisions related to Special Use Permits for off-lease land use authorizations and make recommendations to the BLM regarding mine plan and lease modification approval. In addition, a Section 404 Clean Water Act permit may be required by the U.S. Army Corps of Engineers for the proposed operations.

Two public scoping meetings will be held, one in Wyoming and one in Idaho, each an open house from 7:00 PM - 9:00 PM. The open houses will include displays explaining the project and a forum for commenting on the project. The meetings will be held as follows:

October 7, 2003, Pocatello Airport Meeting Room, Pocatello, Idaho
October 8, 2003, Star Valley High School, Afton, Wyoming

Additional information regarding this project may be obtained from James Blair, Bureau of Land Management, Pocatello Field Office, Idaho (208) 478-6340, or Scott Gerwe, Caribou Targhee National Forest, Soda Springs Ranger District, Soda Springs, ID (208)547-4356. Information relating to this project will also be posted on the internet as it becomes available at: www.id.blm.gov/offices/pocatello/sim_fg.

With this letter, we are soliciting public comments on this proposal. Your comments will help to determine the issues and alternatives that will be evaluated in the environmental analysis. You are invited to direct any comments to: Panels F and G Extension EIS, Bureau of Land Management, Pocatello Field Office, 1111 N. 8th Avenue, Pocatello, Idaho 83201. Email: ID_F_and_G_Panel_EIS@blm.gov. Comments will be accepted through October 18, 2003.

Comments received in response to this solicitation, including names and addresses of those who comment, will be considered part of the public record on this proposed action and will be available for public inspection. Comments submitted anonymously will be accepted and considered. Pursuant to 7 CFR 1.27(d), any person may request the agency withhold a submission from the public record by showing how the Freedom of Information Act (FOIA) permits such confidentiality. Persons requesting such confidentiality should be aware that, under FOIA, confidentiality may be granted in only very limited circumstances, such as to protect trade secrets. The agencies will inform the requester of the agencies' decision regarding the request for confidentiality; and where the request is denied, the agencies will return the submission and notify the requester that the comments may be resubmitted with or without name and address within 10 days.

Sincerely,

JEFF CUNDICK
Acting Pocatello Field Office Manager
Bureau of Land Management

JERRY B. REESE
Forest Supervisor
Caribou-Targhee National Forest

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